



Kaplan Fox & Kilsheimer LLP  
850 Third Avenue  
New York, NY 10022  
phone 212.687.1980  
fax 212.687.7714  
email mail@kaplanfox.com  
www.kaplanfox.com

July 28, 2010

**By Electronic Case Filing**

Honorable John Gleeson  
United States District Judge  
United States District Court  
for the Eastern District of New York  
225 Cadman Plaza East, Room 727S  
Brooklyn, NY 11201-1818

Re: *In re Air Cargo Shipping Services Antitrust Litigation*, MDL 1775

Dear Judge Gleeson:

We represent the plaintiffs in the above-referenced matter. By this letter, plaintiffs respectfully submit three proposed orders in connection with the following motions:

1. Plaintiffs' Motion for Preliminary Approval Of Settlement with Defendants Société Air France, Koninklijke Luchtvaart Maatschappij N.V., and Martinair Holland N.V., filed July 14, 2010 [Dkt. Nos. 1207-1210] (proposed order attached as Exhibit A);
2. Plaintiffs' Motion for Preliminary Approval of Settlement with Defendant Japan Airlines International Co., Ltd., filed July 20, 2010 [Dkt. Nos. 1211-13] (proposed order attached as Exhibit B); and
3. Plaintiffs' Motion for Preliminary Approval of Settlement with Defendants AMR Corp. and American Airlines, Inc., filed July 26, 2010 [Dkt. Nos. 1215-17] (proposed order attached as Exhibit C).

An identical proposed "Notice of Proposed Class Action Settlement" and "Publication Notice" are annexed to each proposed order as Exhibits 1 and 2, respectively. These notices contemplate that the "Notice of Proposed Class Action Settlement will be mailed to potential class members within 30 days after receipt of customer lists requested from those defendants who have not yet provided them, and that the Publication Notice shall be published as soon as practicable thereafter. Today, plaintiffs filed a request for the Court to set a schedule for the production of customer lists from the new corporate defendants named in the Benchmark



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complaint, China Airlines Ltd., EVA Airways Corp., Malaysia Airlines, and Air India [Dkt. No. 1219].

Because defendants' customer lists are necessary for the dissemination of notice, the proposed orders contemplate that the Court will postpone scheduling a Fairness Hearing for each settlement until the lists have been produced.

For the Court's convenience, copies of each proposed order in their native formats will be sent via e-mail to Ms. Poonam Kumar.

Respectfully submitted,

/s/ Robert N. Kaplan

Robert N. Kaplan, Esq. (RK-3100)  
Gregory K. Arenson, Esq. (GA-2426)  
Jason Zweig, Esq. (JZ-8107)  
Gary L. Specks, Esq. (GS-8767)  
KAPLAN FOX & KILSHEIMER LLP

/s/ Howard J. Sedran

Howard J. Sedran, Esq.  
Austin Cohen, Esq.  
LEVIN, FISHBEIN, SEDRAN & BERMAN

/s/ Hollis L. Salzman

Hollis L. Salzman (HS-5994)  
Jay L. Himes (JH-7714)  
Gregory S. Asciolla (GA-2222)  
LABATON SUCHAROW LLP

/s/ Michael D. Hausfeld

Michael D. Hausfeld, Esq.  
William P. Butterfield, Esq.  
Brent W. Landau, Esq.  
Hilary K. Scherrer, Esq.  
HAUSFELD LLP

*Co-Lead Counsel*

**CERTIFICATE OF SERVICE**

I, Elana Katcher, declare that, on July 28, 2010, I caused true and correct copies of the foregoing letter to the Honorable John Gleeson and its accompanying exhibits to be delivered via the Court's ECF system to all counsel of record and to the following parties via FEDERAL EXPRESS.

Jan Lillieborg, *pro se*  
Badhusvägen 11  
165 71 Hässelby, Sweden

Keith H. Packer, *pro se*  
Winters View, 1A Mountain Ash,  
Marlow, Bucks, SL7 30B  
01628 488760  
United Kingdom

/s/ Elana Katcher  
Elana Katcher